



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

September 20, 2005

John Dunn  
District of Columbia Water and Sewer Authority  
5000 Overlook Ave, SW  
Washington DC 20032

Re: Sampling at multi-family dwellings

Dear Mr. Dunn:

Pursuant to WASA's proposed protocol related to the replacement of lead services at multi-family dwellings, and the conference call of September 15, 2005, I am addressing your questions about conducting post-replacement sampling at these locations. As you now know, 40 CFR 141.84(d)(1) does not authorize EPA to waive the requirement to collect samples from the service line after replacement. However, multi-family dwellings pose challenges in sample collection and information dissemination that are not addressed by current EPA regulations or guidance. Thus, until EPA regulations or guidance addresses multi-unit buildings (which we will discuss with the Office of Water), we suggest the following activities for multi-family dwellings:

- Provide one post-replacement test kit per service line replaced.
- Provide that kit to an on-site owner or superintendent where possible. If not available or known, leave the kit for a tenant to collect the sample.
- Provide the results to the property owner. Encourage the owner to share the results with tenants. The report of test results may provide an explanation of factors that might affect the results. This information can also be incorporated into the tenant information that instructs them to flush the water to reduce the short-term risk from particulate lead contamination.

WASA also requested that EPA provide suggestions for language to address potential deviation from sample collection protocol that exists because water may not remain stagnant in the service line for an appropriate length of time. WASA is not required to use this exact language.

*Your superintendent, or a tenant in this building, has provided WASA with a sample of water taken after the service line was replaced. This test was designed to be conducted after a 6-hour suspension of water usage so the water could sit in*

*the service line. Because you live in a multi-unit building, getting all tenants to suspend water usage at the same time is not likely, and the test results may not accurately reflect the lead level at the time of replacement. If you have any questions about the test results, please contact WASA at ....*

If you have any questions, please contact Lisa Donahue at 215-814-2062.

Sincerely,

A handwritten signature in cursive script, appearing to read "Maria Concell".

*for* Roger Reinhart, Acting Chief  
Safe Drinking Water Act Branch

cc: Avis Russell, WASA

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# DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

5000 OVERLOOK AVENUE, S.W., WASHINGTON, D.C. 20032

OFFICE OF THE GENERAL MANAGER

TEL: 202-787-2609

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Copies to Jennie S.

Lisa  
Korwin

July 7, 2005

Karen D. Johnson, Chief  
Safe Drinking Water Act Branch (3wp32)  
Office of Compliance and Enforcement  
Water Protection Division  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103

Subject: Proposed Protocol Related to the Replacement of Lead Services at Multi-Family Dwellings

Dear Ms. Johnson:

The purpose of this letter is to present the DC Water and Sewer Authority's (DCWASA) plans for the notification, post-partial testing, and post replacement flushing of multi-family dwellings throughout the District of Columbia. DCWASA is committed to replacing the lead services at multi-family dwelling as a priority, thus your prompt attention to these matters is needed.

### Notifications

For most multi-family buildings, DCWASA has a record of the number of apartment units in the building; but does not have the mailing address for each unit. For example, if a building has nine units, we do not know if the addresses are Apartments 1 through 9, Apartment 1A, 1B, 1C, 2A, 2B, etc., Apartment 101, 102, and so on. Further, in most cases we do not have tenant names on record. Thus, we believe the plan shown below to be the most practical and thorough solution.

- Forty-five day written notification packages will be sent to the billing address of record for each dwelling. Each package will contain information on post partial flushing, an advisory of continued precautions for partial replacement customers to take, and information DCWASA's private service line replacement opportunity.



- The cover letter will specify the following: **“YOU MUST POST THE ENCLOSED INFORMATION WHERE YOUR TENANTS WILL SEE IT.** Please contact our Lead Service Hotline at 202-787-2732 if you would like additional copies.”
- Two weeks prior to the lead service replacement, DCWASA will distribute an informational brochure to each address reiterating the need for post partial flushing and discussing what to expect during construction. If access to the building is possible, one brochure will be left on or at the door of each apartment unit. If access is not possible,

DCWASA will attempt to contact the building manager for entry. If access is still not possible, DCWASA will leave a bag at the front door of the building with a label that reads: “Please Take One Handout per Apartment.” Sufficient quantities will be left so that there is one for each unit in the building.

- DCWASA will distribute post replacement information to multi-family dwellings that have had partial replacements to include post-replacement flushing, and information on what to expect after construction. If access to the building is possible, one set of each of the two attachments will be left on or at the door of each apartment unit. If access is not possible, DCWASA will attempt to contact the building manager for entry. If access is still not possible, DCWASA will leave a bag at the front door of the building with a label that reads: “Please Take One Set of Handouts per Apartment.” Sufficient quantities will be left so that there is one set for each unit in the building.

#### Post-Partial Sampling

DCWASA proposes not to perform post-partial testing for multi-family dwellings. The instructions for performing post partial testing in the Lead and Copper Rule are not practical or rational with respect to testing in multi-family units. For example, coordinating the activities of all residents so that there is no water usage in the building for a minimum of six hours is not feasible. Further, due to the variations in pipe configuration within multi-family buildings, providing instructions on collecting a meaningful second draw sample, i.e., one that would consist of water sitting in contact with the service pipe, would be very difficult as well. In lieu of providing kits that would result in meaningless and perhaps misleading test results, and lacking any technical basis or authority to devise test protocols, WASA is proposing no test for these customers.

#### Post-Partial Flushing Instructions

- Immediately upon putting the pipe back in service, DCWASA’s contractor will flush for 15 minutes from an outside hose bib if available.



Karen D. Johnson

July 7, 2005

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- In addition, before water service is restored to the building, DCWASA will deliver a flyer (sufficient copies for every unit) with instructions to conduct a 15-minute flush at the kitchen sink before using water for any other purpose.

Please provide your approval or comments to the plans submitted herein as soon as possible so that we can proceed with these replacements on a priority schedule.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Dunn" with a stylized flourish at the end.

John T. Dunn, P.E.

Chief Engineer/Deputy General Manager

